

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
NISHA BROOKS-WHITTINGTON  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax

6 Attorney for Kory Allen Crossman

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 KORY ALLEN CROSSMAN,

14 Defendant.

Case No. 2:07-cr-145-KJD-PAL-9

**STIPULATION TO EXTEND**  
**DEADLINES IN THIS COURT'S**  
**OCTOBER 6, 2015 ORDER BY**  
**THIRTY (30) DAYS**

(Third Request)

15  
16 The United States of America, by Assistant United States Attorney Elizabeth Olson  
17 White, and Defendant Kory Allen Crossman, by Assistant Federal Public Defender Nisha  
18 Brooks-Whittington, submit the following Joint Stipulation to extend, by thirty (30) days, all of  
19 the deadlines set in this Court's Order dated October 6, 2015. *See* CR # 1485.

20 The parties agree and stipulate to the following:

21 1. On November 26, 2008, this Court sentenced Defendant to 140 months'  
22 imprisonment on his conviction for drug-related offenses. CR # 437.

23 2. On March 23, 2015, undersigned counsel filed a motion for appointment of  
24 counsel pursuant to 18 U.S.C. § 3006A and Local Rule 44-1 on behalf of Mr. Crossman to  
25 determine whether he may qualify to seek a reduction of his sentence in light of Guidelines  
26 Amendment 782 and 18 U.S.C. § 3582(c)(2). CR # 1474.

1           3.       On April 8, 2015, this Court issued an Order appointing the Federal Public  
2 Defender to represent Defendant, and setting deadlines. Specifically, the Court ordered the  
3 Probation Office to provide certain documents to the parties within 30 days (i.e., by  
4 May 8, 2015) and ordered the Federal Public Defender to file any appropriate motion or  
5 stipulation within 120 days (i.e., by August 6, 2015). CR # 1475.

6           4.       On August 6, 2015, the parties filed a joint stipulation to extend the deadlines in  
7 this Court's April 8, 2015 Order by 60 days. CR 1480. On August 18, 2015, the Court granted  
8 the stipulation. CR 1482. The parties filed a second stipulation to extend the deadlines, which  
9 was granted on October 6, 2015. CR # 1484, 1485.

10          5.       Since the last stipulation was filed, the parties have received Mr. Crossman's  
11 disciplinary hearing and progress report records. Defense counsel, however, needs additional  
12 time to review those records and file the motion for a sentence reduction.

13          6.       For the reason stated above, the parties respectfully request that the Court issue  
14 an order extending the deadlines in the Court's October 6, 2015 Order by thirty (30) days.

15               DATED this 18th day of November, 2015.

16                               Respectfully submitted,

17  
18       RENE L. VALLADARES  
19       Federal Public Defender

      DANIEL G. BOGDEN  
      United States Attorney

20       /s/ Nisha Brooks-Whittington


      /s/ Elizabeth O. White

21       \_\_\_\_\_  
22       NISHA BROOKS-WHITTINGTON  
      Assistant Federal Public Defender

      \_\_\_\_\_  
      ELIZABETH O. WHITE  
      Appellate Chief and  
      Assistant United States Attorney

23       DATED: November 19, 2015

      IT IS SO ORDERED

24  
25                                 
26                               \_\_\_\_\_  
      U.S. DISTRICT JUDGE  
      KENT J. DAWSON